



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 16 2014

CERTIFIED MAIL 7012 1010 0001 8097 2652
RETURN RECEIPT REQUESTED

Mrs. Brenda Gass
D&B Custom Powder Coatings & Hydrographics, Inc.
457 N. Industrial Boulevard
Trenton, Georgia 30752

Re: Information Request Pursuant to Section 308 of the Clean Water Act
D&B Custom Powder Coatings & Hydrographics, Inc.

Dear Mrs. Gass:

On June 24, 2014, the U.S. Environmental Protection Agency Region 4, performed an inspection of D&B Custom Powder Coatings & Hydrographics, Inc.'s (D&B) facility (Facility) located at 457 N. Industrial Boulevard in Trenton, Dade County, Georgia. The purpose of the inspection was to evaluate the Facility's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 433; and the State of Georgia's pretreatment regulations at Georgia Rule 391-3-6-.08.

In a letter dated October 6, 2014, the EPA provided an Inspection Report describing specific observations made at the Facility during the inspection. The EPA is continuing to investigate the Facility's compliance with the CWA, including Section 402(p), 33 U.S.C. § 1342(p). Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that D&B provide the information set forth in Enclosure A within 21 days of your receipt of this letter.

D&B's response should be submitted to:

Ms. Pamala Myers
U.S. Environmental Protection Agency, Region 4
NPDES Permitting & Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

All information submitted must be accompanied by the following certification that is signed by a duly authorized company official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of

ENCLOSURE A

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT AND SECTION 3007 OF THE RESOURCE CONSERVATION AND RECOVERY ACT

Instructions

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.
5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information unknown or unavailable to you as of the date of your submission of a response to this Information Request should later become known or available to you, then you must supplement your response to the EPA. If you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, then you must notify the EPA as soon as possible.
7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question by providing the information in writing.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained and their contact information.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, then identify such persons, their contact information, and the additional information or documents that they may have.
11. The EPA requests that all documents provided in an electronic format be compatible with pdf.
12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, then provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
3. The terms "And" and "Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
4. The term "Identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
5. The term "Identify" means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
6. The term "Identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
7. The term "Facility" means D&B Custom Powder Coatings & Hydrographics, Inc.'s facility located at 457 N. Industrial Boulevard in Trenton, Dade County, Georgia.
8. The term "You" and "Your" shall mean D&B Custom Powder Coatings & Hydrographics, Inc.
9. The term "Permit" shall mean an industrial user permit issued to the Facility by the Control Authority.
10. "Control Authority" shall have the meaning set forth in 40 C.F.R. § 403.3(f).
11. The term "Stormwater" means any runoff generated when precipitation from rain or snowmelt events flows over land or impervious surfaces and does not percolate into the ground.

Questions

1. Identify the names and addresses of the current owner(s) of the Facility property. Specify the legal name with the exact spelling of each owner. Specify the state of incorporation and principal place of business for each corporate owner. If incorporated, provide the name and mailing address of the registered agent. Additionally, provide a copy of the deed(s) of ownership of the Facility.
2. If the Facility has applied for and/or received a Permit for such discharges, then provide a timeline of the wastewater permitting history for the Facility since the discharge of process wastewater from the Facility to the public sewer began, including:
 - a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;
 - b. the date(s) that draft or final Permit(s) were received by the Facility; and
 - c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

3. Provide complete copies of all communication to or from the Control Authority which concerns the Facility's process wastewater discharge(s). This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded.
4. Provide current schematics of the Facility property identifying the physical boundaries, the individual operational areas, and the process wastewater sources within each production area.

Include a separate schematic identifying the pathway(s) of process wastewaters, the pathway(s) of non-process wastewaters, any in-line valves/storage/appurtenances, and any points of combining flows, beginning from the source(s) of the flow to the termination points at public sewers or other locations. Include a flow balance on this schematic identifying the current average daily flow rates of process wastewater and non-process wastewater during production. Identify the rate at each originating source, prior to each point of combining flows, and at each point of flow termination or storage. Identify the originating processes for the flows, the means of disposal at the termination points, the capacity and utilization of any storage, the flow rates in gallons per day, and whether each flow rate is measured or estimated.

5. Provide a timeline identifying the Facility's construction, and narrative describing its production equipment and their purpose and acquisition dates. Include the dates when the initial construction of the Facility began and when the initial discharge of process wastewater to the public sewer began.

6. If the Facility was purchased in whole or part, then provide the final contract date(s) for the purchase(s). Provide the final purchase contract dates and detailed descriptions of any substantive modifications, additions, or replacements made to any production equipment.
7. Provide a detailed discussion of the Facility's products and production processes, referencing the process source schematic provided for the production areas in item #4 above. Include the raw materials used, their preparation and their combination including, but not limited to:
 - a. Any physical/chemical preparation of the materials used, and if that is performed on-site;
 - b. Any material data sheets for all paint and chemical products used and an inventory of all products used or stored at the Facility.
8. Provide all wastewater monitoring data collected by, or under contract to, the Facility since the discharge of process wastewater from the Facility to the public sewer began. The EPA prefers that such data be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Present the data for laboratory-tested samples separately from data for flow, pH, temperature and other field- or continuously-monitored parameters. Include the following for each data point:
 - a. Parameter monitored;
 - b. Date monitored (month/day/year);
 - c. Analytical result;
 - d. Units;
 - e. Analytical method;
 - f. Sample type (grab, time-proportional composite, or flow-proportional composite)
 - g. Flow recorded at the time of monitoring;
 - h. Sampling location; and
 - i. Flow monitoring location.

Analytical methods need only be provided for laboratory analyses; for flow, pH, temperature and other field- or continuously-monitored parameters, identify the testing equipment used and their calibration frequencies. For flow monitoring data, only (a), (b), (c), (d), and (i) above need to be provided. Location descriptions for (h) and (i) should be identifiable on the schematics provided in item #4 above.

9. For each month since the discharge of process wastewater from the Facility to the public sewer began, identify in a spreadsheet:
 - a. The days of production;

- b. The monthly production (weight, number of items, or linear feet); and
 - c. The monthly process wastewater discharge flow to the sewer, indicating measurements and estimations.
- 10. Provide dated color photos of the Facility's typical production discharge to the sewer (if accessible), and of any wastewater treatment systems used prior to discharge. Identify the subject matter and location with each photo and reference the locations as they are identified on the schematics provided in item #4 above.
- 11. Provide a copy of any inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the process wastewater discharge or stormwater from the Facility since the discharge of process wastewater from the Facility to the public sewer began.
- 12. Provide copies of materials that meet all applicable requirements in accordance with the regulations at 40 C.F.R. § 403.12 and under the Permit beginning at least 90 days before discharge to the public sewer until the date of this Information Request, including, but not limited to:
 - a. Baseline report, as required by 40 C.F.R. § 403.12(b)
 - b. Report on initial compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(d); and
 - c. Periodic report(s) on continuing compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(e).
- 13. Provide a signed copy of all Notice(s) Of Intent (NOI) for coverage under the State of Georgia Storm Water Discharges Associated with Industrial Activity, Permit No. GAR050000, effective on June 1, 2012. If no permit was obtained, provide a detailed explanation of the reason(s) for not obtaining authorization under a stormwater National Pollutant Discharge Elimination System permit.
- 14. Provide a copy of the current Storm Water Pollution Prevention Plan (SWPPP) and any other SWPPPs that may have been in effect since June 1, 2012.
- 15. Provide a detailed description of the substances in the wash mixture that is used outside of the building at the Facility. Include the raw materials used, their preparation and their concentrations. Also, provide the pH of the wash mixture.

ENCLOSURE B

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.